

United States District Court
Western District
Southern Division

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CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: KB SCANNED BY: VB, 44

Ronnie Dante Thomas, #254903

Plaintiff,

Case No: 1:25-cv-00020
Hon. Jane M. Beckering

v.

Unknown Piggett, et al.,

Defendants.

Affidavit Of Ronnie Dante Thomas

Ronnie Dante Thomas (hereinafter "affiant") being first duly sworn, depose and say:

- 1) In 2022, Affiant submitted a 42 USC subsection 1983 complaint to this Court naming as Defendant long-time Michigan Dept. of Corrections (MDOC) employee and high-ranking (Warden) State official, Sherry Burt (retired) of Muskegon Correction Facility (MCF). Said complaint alleg. a first amend. Retaliation Claim. Among other legal claims; Case No. 1:21-cv-296;
- 2) At the same time, Affiant aided and assisted prisoner Jimmie Leon Gordon, #527260 (who does not have the reading ability to assert his federal constitutional rights that would permit a fair hearing from the judiciary) in submitting a section 1983 complaint in 2021-22 naming as Defendant Sherry Burt and Darrell Steward (assistant deputy Ward). Said complaint alleged an Eight Amend. deliberate indifference and First Amend. retaliation claim, among other legal claims; Case No.
- 3) In spite of Affiants judicial submissions in (this) Court as

indicated in PP. 1-2, the District Courts concluded "claims were not stated in those submissions;

- 4) While at MCF Affiant submitted an Appeal to the Sixth (6th) Circuit Court of Appeals on his independent appeal and assisted prisoner Gordon, #527260 with his Appeal. Affiant in 2022 Fed started a Limited Liability Company called Syllogic Visions Consulting (SVC), LLC (Michigan) aimed at providing assistance to prisoners in asserting federal constitutional rights in the conditions of confinement context. An enumerated aim of SVC, LLC is to fill a gapping-hole (caused by the MDOC) in utterly failing in its affirmative duty to assist inmates in accessing the Courts as mandated by Knop v. Johnson, 977 F.2d 996 1003 (6th Cir. 1992). MDOC has been implementing a written policy indicating among other things, that: "If a prisoner has a General Equiv. Diploma (GED) or High School Diploma, that prisoner is ineligible for aid and assistance from the Writ Writer Program";
- 5) As a result, of the instant policy, Affiant has assisted about fifty (50) prisoners who's Habeas Corpus Petitions were denied and Michigan Court Rule (MCR) 6.500 et seq. motion ineffectively prepared by jailhouse lawyers preying on other prisoners (illiterate, semi-illiterate, mentally ill) in order to earn marginal amounts of cash, or other forms of goods/services that can be traded in-exchange for legal assistance relative to the aforementioned policy;
- 6) While at MCF Affiant engaged in formal and informal contracts as a Member-manager of SVC, LLC. Affiant and SVC, LLC assisted prisoner Gordon, #527260 procuring a mandate from the 6th Cir. Ct. App. (No. 21-1832, Sept. 13, 2022) and a positive judgement from the Michigan Court of Appeals (7-21-22, Case No., 360940), prisoner Gordon propagated Affiant and SVC, LLC's marginal success throughout the MCF general

population and within days masses of prisoners in Affiants housing unit swamped Affiants cell/room for assistance in their criminal cases admin. grievances and related section 1983 petitions;

- 7) Somehow, via the proverbial institutional-grapevine word of Affiant and SVC, LLC captured the attention of the new MCF Admin. (post Sherry Burt) a stream of properly drafted-admin. grievances were submitted against MCF officials and section 1983 petitions thereto;
- 8) In Nov. 2022, Affiant and SVC, LLC assisted a MCF prisoner with a covid-19 related section 1983 naming as Defendant one again, Warden Burt and MDOC Director Heidi E. Washington included. In Dec. 2022, Affiant was abruptly transferred (after seven (7) years.) to another facility premised on Affiant and SVC, LLC assisting other inmates procure meaningful access to the courts in getting their matter before a court in a form capable of remedy; that right is without "meaning" (substance) if the inmate cannot prepare an understandable, effective complaint for a judge's consideration. Meaningful access to the courts encompasses all the means an inmate might require. To get a fair hearing from the judiciary on all charges against him or grievances alleged by him;
- 9) Affiant's MCF transfer greatly suggest retaliatory animus on the part of MDOC. Also even if Affiant wanted to submit a section 1983 on the issue it would have been immediately denied by this Court pursuant to the Prisoner Litigation Reform Acts (PLRA) three (3) strikes provision.
- 10) Upon obtaining property at receiving facility Lakeland Correctional Facility (LCF) from MCF, Affiant typewriter was damaged and required substantial repair estimated \$300.00 a typewriter is a vital economic resource for operating SVC,

LLC providing memory storage facilitating efficiency and effectiveness in case management, document drafting as well as professional Appeal in aid to the Admin. of justice;

- 11) The Retaliatory Animus relative to Affiants and SVC, LLC's damaged property by the MDOC officials is not overt, but subtle. Affiant's typewriter was clearly operational before being transferred. Again, Affiant was constrained by the PLRA three (3) strikes provision;
- 12) Affiant was compelled to out source typing to other prisoners for a marginal fee, and "nondisclosure agreements" in place;
- 13) Affiant was transferred from LCF (in less than thirty (30) days, Jan. 2023) to Saginaw Regional Facility (SRF). Affiant was not provided a reason for the transfer. While at SRF, Affiant procured the required repair's. In June. 2023, officer's in Affiants housing unit fabricated a means to send Affiant to Segregation Housing based on violating MDOC rules. While packing Affiant's property, an officer issued a Notice Of Intent (NOI) on all of Affiants legal treatise's, typewriter w/memory and Affiants mental impressions thereto, on the grounds that the books and typewriter was altered in spite of the SRF property room officer approving said items;
- 14) Affiant was found "not guilty" for the alleged rule violation by Admin. Law Judge. However, during an informal Admin. hearing conducted by a Prison Counselor (PC), whom was an ex-corrections officer, cursorily agreed with the officer that authored the NOI. The PC's disposition was to destroy property within thirty (30) days in-relation to Admin. grievance process in the event it is sought;
- 15) Affiant pursued the three (3) stage grievance procedure as

fiduciary for SVC, LLC being that the typewriter was the property of Thomas Family Trust via a quitclaim deed executed between Affiant in the capacity of prisoner and Affiant in trustee capacity for the Thomas Family Trust on Oct. 15, 2004. While at SRF, Affiant submitted an Intramural Correspondence to the housing unit Resident Unit Manager (RUM) requesting Internal Revenue Service (IRS) form 1065 on behalf of SVC, LLC (partnership) and form 1041 on behalf of the Thomas Family Trust (trustee). However, the RUM denied the request premised on MDOC policy despite, Michigan Compiled Laws. Affiant was constrained by PLRA's three (3) strikes provision. After nineteen (19) years under State custody the MDOC grievance procedure is cynical at best. See, Attached SRF RUM's Response;

- 16) Affiant's security Classification status was reduced from two (2) to one (1). Affiant was transferred from SRF (cell/room) two (2) occupants, Jackson-Cooper Street, (JCS) facility with open-barracks. Culture Shock, after over fifteen yrs. in a relatively isolated setting. Affiant was transferred to JCS in July 2023. While Affiant slept, another prisoner, from another part of the barracks, was in personal space rummaging through Affiant's property attempting to steal. Affiant awoke confronting the intruding prisoner. Affiant was brutally assaulted by the Intruding prisoner. Affiant did not return and/or exchange punches/blows with intruder by "oddly" received a Class 1 Misconduct (Fighting) for merely shoving/pushing an imposing prisoner out of Affiant's living space and/or area of control;
- 17) Housing Unit officer took Affiant to Segregation Housing, left affiant's property "unsecured" allowing other prisoner's to burglarize, invade and steal Affiant's marginal prison-acquired valuables. The next day, Affiant was transferred to Robert G. Cotton Correctional Facility

(JCF) thereafter, (the next day) transferred to St. Louis Facility (SLF), after about ten (10) days transferred to Carson City Correctional Facility (DRF) while at DRF, Affiant received news that the Sixth (6th) Cir. Court of Appeals vacated (Case No. 21-1715) (7-21-23) the U.S. Dist. Courts opinion (on a retaliation claim) against Defendants, Warden Sherry Burt Elisha Hardiman, Library tech., Patrisha Mercer, Assistant Libruary tech., mandate issued 8-14-23;


- 18) After Affiant and SVC, LLC prevailed on appeal, the retaliatory animus amplified upon Affiant by the MDOC regime. While at DRF an Admin. Law Judge found Affiant not guilty on due process grounds relative to the JCS fighting misconduct. Nevertheless, an officer at DRF found an Ink-pen in Affiant's cell/room, said it smelled like smoke, alleged that Affiant was smoking a substance and issued a Class 1 Misconduct (substance abuse). Affiant was found guilty lost institutional routine work assignment and visiting privileges for one (1) yr. as a result of misconduct;
- 19) Affiant has been on the waiting list for college programming since 2022 (MCF); to no-avail, the MDOC Regime has not made any effort toward facilitating Affiant's Rehabilitative efforts toward placing Affiant at a satellite facility to procure an Associate degree via a Pell Grant pilot. Again, Affiant has been on the waiting list since its inception (2022);
- 20) Affiant was transfered from DRF to Newberry Correctional Facility (NCF) in the upper-peninsula (in the middle of No-Where). NCF has no educational programing, vocational or otherwise. Yet another retaliatory transfer, with impunity;
- 21) After another round of transfers (SLF, Woodland Center-Correctional Facility (WCC)) upon transferring to WCC Affiant waited six (6) weeks for "some" personal property to

catch-up but, prisoner's whom arrived the same day as Affiant procured their personal property the next day after arriving. Dec. 2023, Affiant procured all personal property less, television and new typewriter at the end of Jan. 2024. Affiant was transfered from WCC back to JCS, to JCF, Parnall Correctional Facility (SMT), back to DRF, Back to SRF, from SRF to Thumb Correctional Facility (TCF), to Handlon Michigan Training Unit (MTU) and ultimately to the "Epicenter" for deliberate-indifference to Federal Law (Constitutional or otherwise), Bellamy Creek Correctional Facility (IBC);

- 22) MDOC, has a sub-cultural org. problem within its general population (G.P.). The sub-cultures thereto are the "Bloods", "Gangster Disciples (G.D.'s)", "Vice Lords (.V.L.'s)" and other linked "micro-groups". All groups named herewith, are designated as a National Security Threat Group (STG). However, the MDOC at just about every facility is unable to appropriate staff to implement effective management of it's sub-cultural org. problem. The sub-cultural org.'s are not a threat to the human resources (State Officials). Those groups are a threat to the Policy of the State which is an environment that cultivates growth, development and treatment for anti-social thinking (Rehabilitation);
- 23) Instead of Affiant and SVC, LLC obtaining regard from the MDOC, in their efforts in assisting literate and illiterate inmates alike, tailored to their differing needs and abilities, Affiant and SVC, LLC has become an experiment for extreme retaliation by the MDOC regime. Affiant cast MDOC a "Regime" as a result of the almost twenty (20) yrs. in it's custody (experience), it wilful disregard for the U.S. Constitution and American Citizen's (albeit "prisoners" therewith and most importantly, human dignity).

I declare that the statement (pp. 1-23) above are true to the best of Affiant's information, knowledge and belief, under the penalty of perjury.

Respectfully Submitted,

By: 
Ronnie Dante Thomas, #254903
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Date: 7-30-2025

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